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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)	Cause No. CV 20-52-BLG-SPW
MAPLEY,)	
)	DEFENDANTS WATCH TOWER
Plaintiffs,)	BIBLE AND TRACT SOCIETY OF
)	PENNSYLVANIA'S AND
vs.)	WATCHTOWER BIBLE AND
)	TRACT SOCIETY OF NEW YORK,
WATCHTOWER BIBLE AND)	INC.'S JOINDER IN THE HARDIN
TRACT SOCIETY OF NEW YORK,)	CONGREGATION'S BRIEF
INC., WATCH TOWER BIBLE AND)	OPPOSING PLAINTIFFS'
TRACT SOCIETY OF)	MOTION TO COMPEL RE:
PENNSYLVANIA, and BRUCE)	HARDIN CONGREGATION'S
MAPLEY SR.,)	SUBPOENA (Doc. 66)
)	
Defendants.)	
)	
)	
)	
)	

Pursuant to Rule 42(b), F.R.Civ.P. (Doc. 64) points out, the issues presented have significant implications for Jehovah's Witnesses. *See* Doc. 64, p. 3. WTPA and WTNY agree with the Hardin Congregation that a ruling communications made with an express expectation such communications will be maintained in strict confidence are not in fact strictly confidential and are not immune from production would have a chilling impact on Jehovah's Witnesses' ability to practice their faith in accordance with the fundamental tenets, doctrines, canons, beliefs and established practices which ensure congregants and elders that any communication made with an expectation of confidentiality will be maintained as such. *See id.*

Therefore, for the reasons aptly set forth in the Hardin Congregation's BIO Pl.'s MTC Subpoena (Doc. 66), WTPA and WTNY both agree Plaintiffs' Motion to Compel Re: The Hardin Congregation Subpoena (Doc. 58) should be denied.

DATED this 12th day of May, 2021.

By: /s/ Jon A. Wilson

Jon A. Wilson

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Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(d)(2)(E), the undersigned hereby certifies this brief complies with L.R. 7.1(d)(2)(A). According to the word-processing unit used to prepare this brief, the word count is **304** words excluding caption and certificates of service and compliance.

DATED this 12th day of May, 2021.

By: /s/ Jon A. Wilson

Jon A. Wilson

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Tract Society of Pennsylvania*

CERTIFICATE OF SERVICE

I hereby certify that, on May 12, 2021, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802
3. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

<u>1, 2</u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> </u> E-Mail
<u>3</u> U.S. Mail	<u> </u> Overnight Delivery Services

By: /s/ Jon A. Wilson
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